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6 **UNITED STATES DISTRICT COURT**  
7 **NORTHERN DISTRICT OF CALIFORNIA**

8  
9 NATIONAL ABORTION FEDERATION  
10 (NAF),

11 Plaintiff,

12 v.

13 THE CENTER FOR MEDICAL PROGRESS,  
14 et al.,

15 Defendants.

16 Case No. 3:15-cv-3522 (WHO)

17 **STIPULATION AND [PROPOSED] ORDER**  
18 **RE: PLAINTIFF'S BILL OF COSTS**

19 Hon. Judge William H. Orrick, III

20 Pursuant to Local Rule 7-12, Defendants the Center for Medical Progress, Biomax  
21 Procurement Services, LLC, and David Daleiden (collectively, "Defendants") and Plaintiff National  
22 Abortion Federation hereby stipulate to the following:

23 WHEREAS, Counsel for Plaintiff filed its Bill of Costs on May 18, 2021 (ECF No. 728), as  
24 well as its Motion for Attorneys' Fees (ECF No. 727);

25 WHEREAS, pursuant to Northern District of California Local Rule 54-2(a), the deadline for  
26 Defendants to file and serve any objections to Plaintiff's Bill of Costs is 14 days from the date of  
27 filing and service of the same, which corresponds to June 1, 2021;

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1        WHEREAS, the Parties agreed that due to the size and complexity of Plaintiff's Motion for  
2 Attorneys' Fees, the Parties would benefit from an expanded briefing schedule, in which they can  
3 have adequate time to fully brief all issues in the most concise and clear manner for the Court;

4        WHEREAS, therefore pursuant to the Parties' stipulation and the Court's order, the deadline  
5 for Defendants to file and serve their opposition to Plaintiff's Motion for Attorneys' Fees is June 15,  
6 2021 (ECF No. 730);

7        WHEREAS, the Parties have further agreed that it would be in the interest of all parties for  
8 Defendants to also file any objection to Plaintiff's Bill of Costs on June 15, 2021;

9        NOW, THEREFORE, IT IS SO STIPULATED, subject to the Court's approval, that the  
10 deadline for Defendants to file and serve any objection to Plaintiff's Bill of Costs is June 15, 2021.

12      Dated: May 24, 2021

13      /s/ Charles S. LiMandri

14      Charles S. LiMandri (No. 110841)  
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1 Thomas Brejcha, *pro hac vice*  
2 Peter Breen, *pro hac vice*  
3 Matthew F. Heffron, *pro hac vice*  
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6 *Attorneys for Defendant David Daleiden*  
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**ATTESTATION PURSUANT TO CIVIL L.R. 5.1(i)(3)**

13 As the filer of this document, I attest that concurrence in the filing was obtained from the  
14 other signatories.  
15

16  
17 Dated: May 24, 2021  
18

/s/ Charles S. LiMandri  
Charles S. LiMandri

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## [PROPOSED] ORDER

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: May \_\_\_, 2021

---

Judge William H. Orrick

**CERTIFICATE OF SERVICE**

*National Abortion Federation v. The Center for Medical Progress, et al.*  
Case No.: 3:15-cv-3522

I, the undersigned, declare under penalty of perjury that I am over the age of eighteen years and not a party to this action; my business address is P.O. Box 9520, Rancho Santa Fe, California 92067, and that I served the following document(s):

**• STIPULATION AND [PROPOSED] ORDER RE: PLAINTIFF'S BILL OF COSTS.**

I certify that one true and correct copy of the foregoing was served on each of the interested parties in this action, addressed as follows:

10 **(BY MAIL)** I am "readily familiar" with the firm's practice of collection and processing  
11 correspondence for mailing. Under that practice it would be deposited with the U.S. Postal  
12 Service on that same day with postage thereon fully prepaid at Rancho Santa Fe, California  
13 in the ordinary course of business. The envelope was sealed and placed for collection and  
mailing on this date following our ordinary practices. I am aware that on motion of the party  
served, service is presumed invalid if postal cancellation date or postage meter date is more  
than one day after date of deposit for mailing in affidavit.

15 X **(BY ELECTRONIC MAIL)** I served a true copy, electronically on designated recipients  
16 via electronic transmission of said documents.

17  **(BY ELECTRONIC FILING/SERVICE)** I caused such document(s) to be Electronically  
18 Filed and/or Service using the ECF/CM System for filing and transmittal of the above  
documents to the above-referenced ECF/CM registrants.

20 I declare under penalty of perjury, under the laws of the State of California, that the above  
is true and correct.

Executed on May 24, 2021, at Rancho Santa Fe, California.

Kathy Denworth